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8 Attorneys for Defendants Kevin Johnson,  
9 Scott Kriens, Pradeep Sindhu, Robert M. Calderoni,  
Mary B. Cranston, Robyn M. Denholm,  
10 John Michael Lawrie, Stratton Sclavos,  
William R. Stensrud, William Meehan,  
11 David Schlotterbeck, Mercedes Johnson,  
and Nominal Defendant  
12 Juniper Networks, Inc.

13 UNITED STATES DISTRICT COURT  
14 NORTHERN DISTRICT OF CALIFORNIA  
15 SAN JOSE DIVISION  
16

17 ) Master File No. 11-CV-4792-LHK  
18 )  
19 ) IN RE JUNIPER NETWORKS, INC. ) **STIPULATION AND [PROPOSED]**  
20 ) SHAREHOLDER DERIVATIVE LITIGATION ) **ORDER OF DISMISSAL**  
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26 )  
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1 Plaintiffs Olga Ratinova and Lisa E. Coppola (“Plaintiffs”), and defendants Kevin  
2 Johnson, Scott Kriens, Pradeep Sindhu, Robert M. Calderoni, Mary B. Cranston, Robyn M.  
3 Denholm, John Michael Lawrie, Stratton Sclavos, William R. Stensrud, William Meehan, David  
4 Schlotterbeck, Mercedes Johnson, and Nominal Defendant Juniper Networks, Inc.

5 (“Defendants”), by and through their respective counsel of record, hereby stipulate as follows:

6 WHEREAS, on September 27, 2011, plaintiff Olga Ratinova filed a Verified Shareholder  
7 Derivative Complaint titled *Ratinova v. Johnson et al*, Case No.: 11-CV-04792-LHK (the  
8 “Ratinova Action”);

9 WHEREAS, on December 28, 2011, plaintiff Lisa E. Coppola, IRA, filed a Verified  
10 Shareholder Derivative Complaint titled *Coppola v. Juniper Networks, Inc. et al*, Case No. 11-  
11 CV-06667-LHK (the “Coppola Action”);

12 WHEREAS, on January 30, 2012, the Court granted the parties’ stipulation to consolidate  
13 the Ratinova Action and the Coppola Action under the caption *In re Juniper Networks, Inc.*  
14 *Shareholder Derivative Litigation*, Case No. 11-CV-04792-LHK, and appointed the law firms  
15 Levi & Korsinsky, LLP and the Law Offices of David A. Bain, LLC as co-lead counsel for  
16 Plaintiffs, and Bramson, Plutzik, Mahler & Birkhaeuser as liaison counsel for Plaintiffs;

17 WHEREAS, on February 6, 2012, the Court granted the parties’ stipulation to stay  
18 proceedings in this action until an order was entered by the Court denying the motion to dismiss  
19 in the related class action, *City of Royal Oak Retirement System v. Juniper Networks, Inc., et al.*,  
20 Case No. 11-CV-04003-LHK (the “Class Action”);

21 WHEREAS, on July 23, 2012, the Court granted nominal defendant Juniper Networks,  
22 Inc. (“Juniper”)’s Motion to Dismiss the First Amended Complaint in the Class Action without  
23 prejudice, and granted defendant Scott Kriens’ Motion to Dismiss the First Amended Complaint  
24 in the Class Action without prejudice;

25 WHEREAS, on May 17, 2013, the Court granted Defendants’ Motion to Dismiss the  
26 Second Amended Complaint in the Class Action with prejudice;

1 WHEREAS, on July 8, 2013, the Court ordered the parties to file, by July 12, 2013, either  
2 a Stipulation of Dismissal or a Joint Status Report setting forth good cause why the case should  
3 not be dismissed;

4 WHEREAS, the parties to this Stipulation believe that this action should be dismissed  
5 without prejudice; and

6 WHEREAS, Plaintiffs and Defendants agree that all parties will bear their own fees and  
7 costs incurred in connection with this litigation;

8 NOW, THEREFORE, the parties, by and through their undersigned counsel, hereby  
9 agree and stipulate to the following:

10 (1) The above-captioned action shall be dismissed without prejudice; and

11 (2) Plaintiffs and Defendants will bear their own fees and costs.

12 SO STIPULATED.

13 Dated: July 12, 2013

WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation

14 By: s/ Joni Ostler  
15 Joni Ostler

16 Nina F. Locker  
17 Steven Guggenheim  
18 Jessica L. Snorgrass  
650 Page Mill Road  
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19 *Attorneys for Nominal Defendant Juniper Networks,*  
20 *Inc. and Defendants Kevin Johnson, Scott Kriens,*  
21 *Pradeep Sindhu, Robert M. Calderoni, Mary B.*  
22 *Cranston, Robyn M. Denholm, John Michael Lawrie,*  
*Stratton Sclavos, William R. Stensrud, William*  
*Meehan, David Schlotterbeck, and Mercedes Johnson*

23 Dated: July 12, 2013

LEVI & KORSINKY, LLP

24 By: s/ Douglas E. Julie  
25 Douglas E. Julie  
*Admitted Pro Hac Vice*

26 *Attorneys for Plaintiffs Olga Ratinova and Lisa E.*  
27 *Coppola, IRA*  
28

1 Dated: July 12, 2013

LAW OFFICES OF DAVID A. BAIN, LLC

2 By: s/ David A. Bain

3 David A. Bain

4 *Admitted Pro Hac Vice*

5 *Attorneys for Plaintiff Lisa E. Coppola, IRA*

6 Dated: July 12, 2013

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11 *Attorneys for Plaintiffs Olga Ratinova and*  
12 *Lisa E. Coppola, IRA*

13  
14 **[PROPOSED] ORDER**

15 Good cause appearing, it is hereby ORDERED:

16 (1) The above-captioned action shall be dismissed without prejudice; and

17 (2) Plaintiffs and Defendants will bear their own fees and costs.

18 PURSUANT TO STIPULATION, IT IS SO ORDERED. The Clerk shall close the file.

19  
20 Dated: July 13, 2013

21   
Hon. Lucy H. Koh

**ECF CERTIFICATION**

I, Joni Ostler, am the ECF User whose identification and password are being used to file this **STIPULATION AND [PROPOSED] ORDER OF DISMISSAL**. I hereby attest that Douglas E. Julie, David A. Bain, and Alan R. Plutzik have concurred in this filing.

Dated: July 12, 2013

WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation

By: s/ Joni Ostler  
Joni Ostler